

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

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In Re

Case No. 1-17-46331-cec

697 Evergreen Avenue Inc.,

Debtor

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**DEBTOR'S ORDER TO SHOW CAUSE**

Upon the annexed affirmation of Vivia L. Joseph, Esq., dated May 16, 2018, and upon all of the proceedings heretofore had herein;

Let LORI LAPIN JONES, Chapter 7 Trustee, or her attorneys, Creditor, PURMM CAPITAL CORP., or its counsel, show cause before the Bankruptcy Court, in Room 3529 of the United States Bankruptcy Court for the Eastern District of New York, to be held at the Courthouse, 271 Cadman Plaza East, Brooklyn, New York, on the \_\_\_\_\_ day of \_\_\_\_\_, 2018, at \_\_\_\_\_ in the \_\_\_\_\_ noon of that day or as soon thereafter as counsel can be heard, why an Order should not be made and entered:

- a. Permitting Debtor, 697 Evergreen Avenue Inc. to refinance and obtain a new loan in the amount of \$900,000.00 and to use the property known as 697 Evergreen Avenue, Brooklyn, New York, as collateral for such refinancing;
- b. Authorizing payment of any undisputed amounts with respect to the Proof of Claim filed by Purmm Capital Corp.;
- c. Directing that any disputed amounts on the Proof of Claim filed by Purmm Capital Corp. which are not resolved at the time of closing shall be held in escrow by Debtor's attorney, Vivia L. Joseph, Esq., pending further Order of the Court;

- d. Authorizing payment of title bill closing costs and lender's reserves from the loan proceeds;
- e. Awarding reasonable compensation to the Chapter 7 Trustee;
- f. Awarding reasonable counsel fees to counsel for the Chapter 7 Trustee;
- g. Awarding reasonable compensation for other appointees appointed on behalf of the Chapter 7 Trustee;
- h. Awarding reasonable legal fees to Debtor's counsel; and
- i. granting such further and other relief as to the Court deems just and proper, and equitable.

Sufficient reason appearing therefor, it is

Ordered that service of a copy of this order together with the papers upon which it is granted, by mail upon LaMonica, Herbst & Maniscalco, LLP, counsel for Lori Lapin Jones, Chapter 7 Trustee, and Gleich, Seigel & Farkas, LLP, counsel for Purmm Capital Corp. on or before the \_\_\_\_ day of \_\_\_\_\_, 2018, be deemed sufficient service.

Dated:

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Hon. Carla Craig, Judge, Bankruptcy Court

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VIVIA L. JOSEPH LAW GROUP P.C.

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TO:

Clerk's Office

United States Bankruptcy Court

Eastern District of New York